

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	Civil Action No. 7:23-cv-01427-TMC
)	
Plaintiff,)	
)	
v.)	
)	CONSENT MOTION FOR
Litchain Corp. and Gaffney Board of Public)	ENLARGEMENT OF TIME
Works,)	FOR CROSSCLAIMANT, GAFFNEY
)	BOARD OF PUBLIC WORKS, TO
Defendants.)	REPLY TO BLOCKQUARRY'S
)	RESPONSE TO MOTION FOR
)	PARTIAL DEFAULT JUDGMENT
Gaffney Board of Public Works,)	
)	
Defendant/Counter and)	
Crossclaimant,)	
v.)	
)	
Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	
)	
Counterclaim Defendant,)	
and)	
)	
Litchain Corp.,)	
)	
Crossclaim Defendant.)	
)	

Crossclaimant, Gaffney Board of Public Works, South Carolina (“Gaffney BPW”), pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civ. Rule 6.01 (D.S.C.), requests that the Court enter an order permitting a one-week extension of the deadline for Gaffney BPW to file a reply to Blockquarry’s Response to Motion for Partial Default Judgment Filed by Gaffney Board of Public Works (ECF No. 88), giving it until Friday, January 26, 2024 to file its reply. Pursuant to Local Civ. Rule 7.02 (D.S.C.), counsel for Gaffney BPW consulted with counsel

for Blockquarry Corp. f/k/a/ ISW Holdings, Inc. (“Blockquarry”) on January 17, 2024, and Blockquarry consents to the relief sought in this motion.

In further support of this motion, Gaffney BPW states that Blockquarry raises new issues in its response and the supporting declarations of Lawrence Davis (ECF No. 88-1), Beau Bartz (ECF No. 88-2), and Shawn Vaught (ECF No. 88-3) that require investigation by Gaffney BPW and the filing of a declaration of a Gaffney BPW employee in response. Further, the parties require additional time to discuss the potential for reaching an agreement as to the declarations sought by Gaffney BPW in its Motion for Partial Default Judgment Against Crossclaim Defendant, Litchain Corp (ECF No. 84). The additional week to file a reply will allow Gaffney BPW to complete these tasks, which will provide much needed clarification and, hopefully, allow the parties to streamline the issues remaining before this Court for resolution.

Gaffney BPW files the instant motion exclusively for the reasons set forth above and not for undue delay or other improper motive.

WHEREFORE, premises considered, Gaffney BPW moves this Court for an order extending its deadline for replying to Blockquarry’s Response to Motion for Partial Default Judgment Filed by Gaffney Board of Public Works until January 26, 2024.

Respectfully submitted,

POPE FLYNN, LLC

January 22, 2024

By: /s/ Virginia P. Bozeman
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